

MAR 12 1996

DRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Sam Waldo
Director of Environmental Affairs
Amphenol Corporation
358 Hall Avenue
P.O. Box 5030
Wallingford, Connecticut

Re: Administrative Order On Consent (AOC)
(dated November 27, 1990)
Franklin Power Products/Amphenol
IND 044 587 848

Dear Mr. Waldo:

The United States Environmental Protection Agency (U.S. EPA) is in receipt of your February 9, 1996, letter and the enclosed Work Plan for Operable Area 3 dated February 9, 1996. The U.S. EPA hereby approves the February 9, 1996 Workplan with the following modifications (items 1-7) as stated below:

1. Undisturbed soil samples shall be collected at the top of unit C at monitor wells MW-31 and MW-34, and tested for permeability;
2. Samples shall be collected from a borehole located near the south end of Forsythe Street for grain size analysis. In addition, the lithology of the borehole shall be continuously logged down to the Unit C interface;
3. Two aliquots for each split spoon sample shall be collected and placed in glass jars; one aliquot used for field PID testing and the other cooled and stored for potential future laboratory analysis;
4. With the exception of small quantities used for hydration of bentonite, addition of water to monitor well boreholes shall be avoided if at all possible;
5. To ensure that the pump tests results are representative of the hydraulic conductivity of the aquifer, the Forsythe Street wells shall be thoroughly developed by surging as well as pumping/bailing so as to significantly reduce the turbidity in the wells;
6. A profile of the sewer elevation at Forsythe Street shall be included with the field results; and

7. Samples for metal analysis shall be carefully collected to minimize turbidity, preferably below 5 Ntu, and the turbidity recorded.

It is U.S. EPA's understanding as developed during the February 29, 1996, telephone conference between Amphenol and U.S. EPA representatives, the above noted modifications were agreed to, and that should the investigative results and interpretations show significant data gaps, collection of additional field data is not precluded. Though not discussed in the above noted telephone conference, east-west cross sections for the site portion south of Hamilton Avenue would be beneficial in defining the geology at operable area 3. It is recommended that such cross sections be included in the Area 3 report. In addition to the data collected during the field investigation, logs of the geoprobe sampling points and local residential/industrial wells, could be used to develop these cross-sections.

In accordance with our understanding developed during the January 31, 1996, meeting between Amphenol/U.S. EPA representatives, the Corrective Measures Report (CMS) report shall be completed with the submittal of a Supplement to Respondent's September 1995 CMS report. The Supplement to the CMS report shall include the report for the field investigation and also respond to certain comments noted in U.S. EPA's letter of November 14, 1995. In the interest of advancing the corrective action process, only responses to the following are required for the CMS Supplement:

1. A table showing all available analytical results for metals of the groundwater treatment system effluent discharged to the City of Franklin sewer system, the laboratory reports for these analyses, and a discussion of the comparative discharge rates of the city of Franklin sewer system and the treated groundwater; and
2. Sufficient data to fully evaluate the existing on-site groundwater recovery system. If the evaluation does not demonstrate that the existing on-site groundwater recovery system is capable of capturing the entire groundwater contaminant plume generated by contaminant release on the facility property, additional wells shall be proposed to develop a full corrective measure for this plume.

The February 1996 Workplan and resulting report, and the additional responses pertaining to U.S. EPA's November, 1995 letter shall be incorporated into the Supplement to the CMS report, and as Respondent prefers, may be presented as Appendices to the CMS supplement titled as Technical Memorandums. In the February 29, 1996, telephone conference between U.S. EPA and Amphenol representatives, Amphenol suggested that an evaluation of the existing on-site groundwater recovery system would be completed in the near future. It is requested that such evaluation be submitted to U.S. EPA as soon as completed so that this may be reviewed.

Risk assessments pertaining to inorganic constituents in on-site soils have been developed by U.S. EPA in accordance with EPA guidelines and are enclosed in this letter. In addition, U.S. EPA intends to perform a risk assessment for indoor air incorporating the data obtained from the Operable Area 3 field investigation. This information will also be provided to you for review.

U.S. EPA anticipates that these risk assessments will be added (by U.S. EPA) as a modification to the Final CMS report. U.S. EPA believes that these additional risk assessments are needed so that the public can make an informed decision as to remedy selections. If Respondents do not concur with U.S. EPA's risk calculations, Respondents should present its own calculations and a discussion of such assessments. As pointed out in our February 29 telephone conference, proper collection and testing of soil gas at critical locations and depths would provide a more definitive data base for the indoor air risk assessment.

In accordance with the time frame given in the February 1996 Workplan for completion of the field investigation and allowing for time to obtain site access, the Supplement to the CMS report shall be submitted within 90 days of receipt of this letter. Upon approval of the CMS report, U.S. EPA will rescind the stipulated penalties as assessed in the November 14, 1995, letter.

U.S. EPA recommends that prior to initiating the field investigation, Respondents place the June 13, 1994, RCRA Facility Investigation Report and appropriate Technical Memorandums in a repository at Franklin, Indiana for public review.

Respondent's letter of September, 22, 1995, stated that Respondents now believe that the no flow conditions of Hurricane Creek which are needed for implementation of the June 14, 1994 Supplemental Work Plan, are not likely to occur as previously expected. Respondents shall develop an alternative plan to the June 1994 Work Plan and provide such plan as a separate deliverable, within ninety (90) days of receipt of this letter.

If you have any questions, please call Bill Buller of my staff at (312) 886-4568.

Sincerely,

Paul Little, Chief
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

Enclosure

cc: J. Michael Jarvis, Franklin Power Products w/o enclosure
Michael Sickles, IDEM w/enclosure
John Koehnen, A.T. Kearney w/o enclosure

bcc: Larry Johnson, ORC w/o enclosure

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PS Form 3811, December 1991 ☆U.S. GPO: 1993-352-714

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